Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Certification of	)	MB 04-64
Digital Transmission Content	)	
Protection	)	
("DTCP") for Digital Broadcast	)	

SUPPLEMENT TO CERTIFICATION OF DIGITAL TRANSMISSION LICENSING ADMINISTRATOR LLC FOR APPROVAL OF DTCP –IP AS AN AUTHORIZED OUTPUT PROTECTION TECHNOLOGY

The Digital Transmission Licensing Administrator, LLC ("DTLA"), pursuant to Order FCC 04-193 released August 12, 2004 ("Certification Order"), the Public Notice DA 04-145 issued by the Commission on January 23, 2004, and the regulations set forth at 47 C.F.R. § 73.9008, hereby supplements its Certification concerning the approval of the Digital Transmission Content Protection technology ("DTCP," also known as "the 5C technology") over Internet Protocol ("DTCP-IP") for Unscreened Content and Marked Content.

Introduction and Background

DTLA filed with the Commission on March 1, 2004, a Certification requesting approval of DTCP as a digital output protection technology. In its initial submission and in supplements thereto, DTLA provided the Commission with information concerning the mapping and use of DTCP for the following protocols:

IEEE 1394, 1394-similar transports (including Op-iLink), USB, MOST, Bluetooth* and DTCP-IP.

In the Certification Order, the Commission approved the certification request submitted by DTLA with respect to DTCP over 1394 and 1394-similar transports and USB, and certified the use of DTCP-IP subject to submission of a final revised Specification incorporating the RTT-based localization elements set forth in the letters from DTLA to the Commission dated July 20 and 23, 2004. Certification Order ¶¶ 74, 78 and 108. With respect to DTCP-IP, the Commission stated: "Our approval of DTCP over IP is conditioned, however, on DTLA submitting to the Commission final revisions to its mapping specification for DTCP over IP reflecting its proposed RTT requirements." *Id.* ¶ 74.

On February 28, 2005, DTLA issued its Digital Transmission Content Protection Specification Revision 1.4 and Supplement E Mapping DTCP to IP Revision 1.1. Section 8 of Supplement E sets forth the specific requirements relating to additional localization to be employed for DTCP-IP via performance of an RTT test within 7 milliseconds or less. DTCP Specification Revision 1.4 also includes an amendment so as to include in the Device Certificate an Additional Localization (AL) flag bit, which indicates whether the device is capable of performing additional localization testing which, with respect to DTCP-IP, would

* The Commission found that, to obtain certification of DTCP-BT, DTLA was required to submit additional technical information concerning the specifications of the Bluetooth protocol itself, in addition to the submitted DTCP Specification Supplement C for DTCP-BT. Certification Order ¶ 78 n. 333. Pursuant to the Certification Order, on September 27, 2004, DTLA filed an Amendment to its Certification with the requested additional information regarding the Bluetooth technology. As of the filing date of this Supplement, Certification for DTCP-BT remains pending before the Commission..

include the RTT test described above. DTCP Specification Revision 1.4 at 28 and 32.

Notice of the issuance of these revisions to the DTCP Specification, including Supplement E, was sent in electronic form and by hard copy to all Adopters on March 1, 2005. The Informational Version of these documents is available for download from the DTLA website, http://www.dtcp.com

Certification

DTLA certifies that DTCP-IP provides effective protection for Unscreened Content and Marked Content against mass indiscriminate redistribution, and that the February 28, 2005, Specification and Supplement E incorporates the TTL and RTT limits that the Commission in its Certification Order set as conditions to approval of DTCP-IP. DTLA incorporates herein by reference the information set forth in its March 1, 2004, Certification, describing the general operation of the DTCP technology, the level of protection afforded by DTCP, the extent to which DTCP has been licensed and approved by manufacturers and content owners, the licensing terms and conditions applicable to DTCP, and the ways in which use of DTCP accommodates consumer use and enjoyment of digital broadcast content, and the Reply dated April 16, 2004. DTLA also incorporates by reference the additional ex parte submissions made by DTLA in the above-referenced docket.

DTLA further submits in support of this Supplement:

- Digital Transmission Content Protection Specification, Revision 1.4 (Informational Version) as Attachment A

- Supplement E Mapping DTCP to IP, Revision 1.1 (Informational Version) as Attachment B

Conclusion

DTCP is a well-established, tested technology that provides effective protection against unauthorized redistribution of commercial audiovisual content, including digital terrestrial broadcast television. More than 120 companies have obtained licenses from DTLA for the use of DTCP, and the manufacture and resale of devices that incorporate DTCP. More than 50 Adopters have signed the Adopter Addendum that permits them to manufacture and sell components and products using DTCP-IP. DTLA respectfully submits that the additional information in this Supplement and Attachments A and B demonstrates that DTLA has satisfied the condition established by the Commission for Certification of DTCP-IP as an authorized digital output protection technology for the protection of Unscreened and Marked Content.

Respectfully submitted,

Michael B. Ayers
President
Digital Transmission Licensing Administrator, LLC
michael.ayers@tais.toshiba.com

Seth D. Greenstein
Chair, DTLA Policy Committee
McDermott, Will & Emery
600 Thirteenth Street NW
Washington, D.C. 20005-3096
(202) 756-8088
sgreenstein@mwe.com

Dated: March 11, 2005

Certificate of Service

I hereby certify that on March 11, 2005, a copy of the foregoing Supplement to Certification of Digital Transmission Licensing Administrator LLC For Approval Of DTCP–IP As An Authorized Output Protection Technology was served by first class mail, postage prepaid, upon the following persons. In light of the voluminous nature of the Attachments, and that each of these Attachments is available from the DTLA website, http://www.dtcp.com, such Attachments will be made available by DTLA to these parties only upon request.

Jonathan L. Rubin, P.A.
1717 K Street NW
Suite 600
Washington, D.C. 20036
Counsel for American Antitrust Institute

Henry Goldberg
Goldberg, Godies, Wiener & Wright
1229 Nineteenth Street, NW
Washington, D.C. 20036
Counsel for Hewlett-Packard Company

Jon A. Baumgarten
Bruce E. Boyden
Proskauer Rose LLP
1233 Twentieth Street, NW
Suite 800
Washington, D.C. 20036
Counsel for Motion Picture Association of America

Thomas B. Patton
Vice President, Government Relations
Philips Electronics North America Corporation
1300 Eye Street, N.W.
Suite 1070 East
Washington, D.C. 20005

Rick Dorl
Vice President and General Counsel
Philips Consumer Electronics North America
64 Perimeter Center, East
Atlanta, GA 30346

Lawrence Sidman
Sara W. Morris
Paul, Hastings, Janofsky & Walker LLP
1299 Pennsylvania Avenue, N.W.
10th Floor
Washington, DC 20004
Counsel for Philips Electronics North America

Mike Godwin
Public Knowledge
1875 Connecticut Avenue NW
Suite 650
Washington, D.C. 20009
Counsel for Public Knowledge

_____
Seth D. Greenstein